

EXHIBIT 141

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, et al.

Plaintiffs

vs.

CIVIL ACTION FILE
NO. 1:17-CV-2989-AT

BRAD RAFFENSPERGER, et al.

Defendants

VIDEOTAPED ZOOM DEPOSITION OF
SARA TINDALL GHAZAL

November 5, 2021
10:13 A.M.

Lee Ann Barnes, CCR-1852B, RPR, CRR, CRC

1 particular voter's printout, the human readable text
2 is reflected in the QR code?

3 MR. RUSSO: Objection to form.

4 THE WITNESS: An audit should be able to
5 determine whether or not the QR code was
6 correctly counted the -- the voter's choice.
7 If there is a discrepancy in the outcome of an
8 audit versus the outcome of the tabulation,
9 that would suggest that there was a -- a
10 difference.

11 BY MS. ELSON:

12 Q. To your understanding of audits, the --
13 within a single vote -- let me rephrase.

14 So you stated that audits select a
15 statistically significant sample of ballots to
16 review.

17 Do those audits ever compare within a
18 single ballot that the human readable text matches
19 what is reflected in the QR code?

20 MR. RUSSO: Objection to form.

21 THE WITNESS: Not to the best of my
22 knowledge.

23 BY MS. ELSON:

24 Q. So do audits in Georgia verify whether any
25 one individual's vote was counted accurately?

1 MR. RUSSO: Objection to form.

2 THE WITNESS: Audits verify whether the
3 right person won.

4 BY MS. ELSON:

5 Q. So the answer to the question of whether
6 they verify that any specific vote was counted
7 correctly would be no? Am I misunderstanding?

8 A. No. That's -- that -- that is my
9 understanding as well.

10 Q. Okay. If a QR code was changed from what
11 the voter selected, would an audit be able to pick
12 up on that change?

13 A. A single QR code and a single vote, that
14 is unlikely.

15 Q. Are you familiar with any studies that
16 Georgia has commissioned regarding voter
17 verification?

18 A. Yes, I am.

19 Q. And what studies are you familiar with?

20 A. In this past election, there was a
21 study -- I do not recall who undertook the study,
22 but there -- to review how many voters verified --
23 appeared to have verified their ballot.

24 Q. And by verifying their ballot, what do you
25 understand that to mean?

1 Q. Have you read about Dr. Halderman's public
2 reply or his declarations?

3 A. I have seen news reports related to it.

4 Q. And what do those news reports discuss?

5 A. That -- one in particular suggested that
6 he was -- that -- that Dr. Halderman was seeking to
7 share the results of his -- his studies with other
8 parties.

9 Q. Are you aware that he found that Georgia's
10 election system can be hacked in numerous ways?

11 MR. RUSSO: Objection to form.

12 THE WITNESS: That is my understanding
13 based on the reporting, yes.

14 BY MS. ELSON:

15 Q. And are you aware that at least one -- he
16 found that at least one of those hacks can be
17 implemented by a voter in the voting booth in just a
18 couple of minutes?

19 MR. RUSSO: Objection to form.

20 THE WITNESS: I haven't read the report,
21 so I am not aware of that level of detail.

22 BY MS. ELSON:

23 Q. Does hearing that concern you?

24 A. I would have to have much more context.

25 Q. Has the State Election Board taken any

1 action to retrieve that context?

2 MR. RUSSO: Objection to form.

3 THE WITNESS: To the best of my knowledge,
4 no.

5 BY MS. ELSON:

6 Q. And why have -- why haven't they?

7 MR. RUSSO: Objection to form.

8 It's unclear what we're talking about
9 here. Why haven't they done -- done what and
10 what is the context?

11 BY MS. ELSON:

12 Q. Do you understand the question,
13 Ms. Ghazal, or do you want me to repeat or rephrase?

14 A. Could you rephrase, please?

15 Q. Sure.

16 Why hasn't the State Election Board taken
17 any action to learn information about the
18 vulnerabilities that Dr. Halderman found in his
19 report?

20 MR. RUSSO: Object to form.

21 THE WITNESS: I can't speculate what other
22 members are thinking or doing. We -- we are
23 four individuals with one unfilled position.
24 So I don't -- I don't know what they're
25 thinking.

1 BY MS. ELSON:

2 Q. Would you want to know more information
3 about what Dr. Halderman found?

4 A. I am not a technical expert. I don't know
5 how much I would understand, frankly, of what
6 Dr. Halderman found. I believe a high-level
7 understanding would be helpful.

8 Q. And are you aware that we've asked the
9 Secretary of State's offices attorneys to provide a
10 proposal to allow the Secretary of State and the
11 State Election Board access to some or all of the
12 sealed report?

13 MR. RUSSO: Objection to form.

14 THE WITNESS: I was aware that there was
15 some discussion. I didn't -- I'm not aware of
16 the -- the extent of what is -- what has been
17 discussed.

18 BY MS. ELSON:

19 Q. To follow-up on something you mentioned,
20 would you like to receive high-level information
21 about what Dr. Halderman found in terms of
22 vulnerabilities of the Georgia election system?

23 A. Yes.

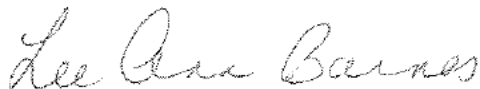
24 Q. Are you aware that the Office of the
25 Secretary of State have hired their own experts in

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.



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